

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

PUTZ FARMS, JOINT VENTURE, A JOINT	§	
VENTURE OF HERBERT PUTZ AND	§	
SIGNE PUTZ	§	
	§	
v.	§	CASE NO. 4:09-cv-355
	§	JURY TRIAL REQUESTED
C. DOUGLAS DONLEY D/B/A	§	
C. DOUGLAS DONLEY CROP INSURANCE	§	

MOTION TO WITHDRAW

TO THE HONORABLE JUDGE OF SAID COURT:

1. Paul Gilliam and Ramey & Flock, P.C., attorneys for Plaintiff Putz Farms, Joint Venture, A Joint Venture of Herbert Putz and Signe Putz, ("Plaintiffs"), request permission to withdraw from representing Plaintiffs.

2. This motion is based on good cause in that:

(a) Plaintiffs have failed to fulfill obligations to pay said attorneys for services rendered in this case; and

(b) Plaintiffs and the undersigned counsel have fundamental disagreements regarding the manner in which to pursue Plaintiffs' objectives in this case, making it extremely difficult for counsel to represent Plaintiffs effectively.

3. This case is set for pretrial conference on July 6, 2010. The undersigned believes it will be necessary for Plaintiffs to request that the Court amend its current scheduling order to permit Plaintiffs to obtain new counsel.

4. A copy of the Court's Scheduling Order entered on October 15, 2009, is attached as Exhibit "A" and reflects the pending deadlines in this matter.

5. A copy of this motion has been delivered to Herbert Putz and Signe Putz at 1825 Locust Grove Church Road, Orange, Virginia 22960, and they have been notified in writing of their right to object to this motion.

WHEREFORE, Paul Gilliam and Ramey & Flock, P.C., respectfully request that this Court make an order permitting them to withdraw from this cause.

Respectfully submitted,



PAUL GILLIAM
State Bar No. 07938700
100 East Ferguson St., Suite 500
Tyler, Texas 75702
Telephone: (903) 597-3301
Facsimile: (903) 597-2413
paulg@rameyflock.com

LEAD ATTORNEY FOR PLAINTIFF

OF COUNSEL:

RAMEY & FLOCK, PC
A Professional Corporation
100 East Ferguson St., Suite 500
Tyler, Texas 75702
Telephone: (903) 597-3301
Facsimile: (903) 597-2413

CERTIFICATE OF CONFERENCE

The undersigned counsel for Plaintiff has conferred with counsel for Defendant, Mr. Bruce McKenna, who has stated that Defendant does not object to this motion.



PAUL GILLIAM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been forwarded to the following counsel via e-filing pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5 on this 14th day May, 2010:

Bruce A. McKenna
Glendening, McKenna Prescott & Robertson
Oklahoma State Bar No. 6021
10108 E. 79th Street
Tulsa, Oklahoma 74133.



PAUL GILLIAM